

FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

RECEIVED

MAR - 1 1996

FEDERAL CONCERNIS CONCERNI

In the Matter of)
Revision of Part 22 and Part 90)
of the Commission's Rules to)
Facilitate Future Development)
of Paging Systems)
Implementation of Section 309(j))
of the Communications Act --)
Competitive Bidding)

PP Docket No. 93-253

WT Docket No. 96-18

DOCKET FILE COPY ORIGINAL

INTERIM COMMENTS OF PAGING NETWORK, INC.

PAGING NETWORK, INC.

Judith St. Ledger-Roty Paul G. Madison **REED SMITH SHAW & McCLAY** 1301 K Street, N.W. Suite 1100 - East Tower Washington, DC 20005 202-414-9281

Its Attorneys

March 1, 1996

TABLE OF CONTENTS

			Pa	ge.				
	Summa	ary		i				
I.	Statement of Interest							
II.	Limited Exceptions To The Freeze Are Necessary To Meet Subscriber Demand							
	Α.	Exception 1 Modest Expansion of Existing Paging Systems Should Be Allowed On A Limited, But Permanent, Basis		5				
	В.	Exception 2 Secondary Site Licensing Should Be Allowed		9				
III.	The Ability To Construct And Operate Fill-In Transmitters And Make Other Minor Modifications Is Vitally Important To Service Availability For Subscribers							
IV.	Other Matters							
	Α.	Nationwide Exclusive PCP Systems		15				
	В.	Licensing Above Line A And Along The United States And Mexican Border		15				
v.	Conc	lusion		17				

Summary

Paging Network, Inc. ("PageNet") hereby submits its Interim Comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM") in WT Docket 96-18 and PP Docket No. 93-253. By the NPRM, the Commission froze the acceptance of applications for both common carrier and private carrier channels. This freeze is detrimental to the ability of paging subscribers to receive paging service. When the Commission considers that the paging subscribership is in excess of 34 million nationwide, the impact of the freeze has an immediate and far reaching impact upon paging subscribers, paging carriers, and the contribution of the entire paging industry to the U.S. economy.

During the period of the freeze, it is in the public interest that paging carriers are able to license additional facilities on both a permanent and secondary basis. To that end, PageNet suggests that the Commission allow paging carriers to license on a permanent basis same channel transmitter sites within 40 miles of a facility that was authorized within an operating system as of the date of the freeze. In addition, PageNet suggests that the Commission allow secondary site licensing of facilities if the licensee is already operating a same channel system within a defined market or geographic service area. These two exceptions to the freeze will allow the maintenance and enhancement of paging services to subscribers during the freeze in addition to mitigating the harsh impact of the freeze upon subscribers and carriers.

In the NPRM, the Commission stated that, within the freeze period, 929 MHz licensees will be able to permissibly modify their systems if their composite interference contour, as calculated pursuant to the formula proposed in the NPRM, was not expanded. PageNet opposes any use of the service and interference contours proposed in the NPRM and believes that these calculations will be highly detrimental to the investment backed expectations of paging carriers that constructed systems under the simple minimum co-channel separations standards provided for in the rules today. To allow 929 MHz licensees the benefits of permissible modification, including 100% fill-in transmitters enjoyed by 931 MHz carriers, the Commission should adopt a 50-mile radius interference contour for 929 MHz and allow the composite of this contour to act as a measure for permissible modifications of 929 MHz systems during the period of the freeze.

In these Interim Comments, PageNet also suggests that nationwide licensees be allowed to continue the build-out of their systems. Since these licensees hold geographic licenses, the build-out of these systems could continue on a permissible basis without coordination or application to the Commission. In addition, during the freeze and beyond, the Commission should continue to license channels allotted to Mexico and Canada in the border areas if the U.S. licensee has permission from the Mexican or Canadian licensee to utilize the channels on the U.S. side of the border area.

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554



In the Matter of)

Revision of Part 22 and Part 90) WT Docket No. 96-18 of the Commission's Rules to)
Facilitate Future Development) of Paging Systems)

Implementation of Section 309(j)) PP Docket No. 93-253 of the Communications Act --)
Competitive Bidding)

To: The Commission

INTERIM COMMENTS OF PAGING NETWORK, INC.

Paging Network, Inc. ("PageNet"), by its attorneys and pursuant to 47 C.F.R. §§ 1.145 and 1.149, hereby submits its comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM") in WT Docket No. 96-18 and PP Docket No. 93-253.¹ By the NPRM, on February 8, 1996, the Commission froze the acceptance of applications for both common carrier and private carrier paging ("PCP") channels.² An across-the-board no-exceptions-type freeze will be highly detrimental to paging subscribers because it will unduly restrict the ability of the paging industry to modify and expand existing systems to meet subscriber demand. In order to protect the ability of paging subscribers to receive high-quality wide-area paging service,

The NPRM was released by this Commission on February 9, 1996.

See NPRM at ¶¶ 139-143.

which is the hallmark of modern paging service, the Commission should adopt interim licensing procedures that will allow paging carriers to meet the demands of paging subscribers by modifying existing operations under specific exceptions to the freeze.

These exceptions are especially necessary in light of the fact that, despite the Commission's and the industry's best efforts, the freeze will last at least one year, and perhaps longer. In support of these Interim Comments, the following is respectfully shown:

I. Statement Of Interest

Over the last dozen years, paging usage has grown exponentially. By the end of the year 1995, the 600 or so paging carriers licensed by the Commission served over 34 million subscribers. By the year 2000, the Personal Communications Industry Association ("PCIA") estimates that paging subscribership could grow in excess of 55 million. Compared to all other mobile services, paging is an unqualified success story. The success in paging reflects a low-cost, high-value portable communications service that tens of millions of Americans rely upon everyday.

The Commission cannot measure the period of the freeze from the date imposed to the date it accepts applications for auction. The freeze must be measured from the date of the freeze until award of licenses and commencement of operation. With so many frequencies and frequency blocks on the auction board, the auction could take months. Under the current rules affecting CMRS, petitions to deny may also be filed, creating even further delays.

Created in 1982, in 14 short years, PageNet has grown to be the largest paging company in the world and currently provides service to approximately 6.7 million paging units throughout the United States. PageNet operates thousands of paging facilities. PageNet has many applications for additional paging facilities that have been pending for weeks, months or years before the Commission and, prior to the freeze, had intended to continue to license paging facilities to improve current service and, as necessary, to expand existing systems and to enter new paging markets under the existing rules. PageNet's prior experience in the process of licensing, constructing, and operating paging facilities makes PageNet eminently qualified to comment on the issues raised in this proceeding.

II. Limited Exceptions To The Freeze Are Necessary To Meet Subscriber Demand

The Commission has encouraged the industry's evolution, based on consumer demand for wide-area and nationwide systems. These wide-area systems reflect the natural progression of market development and allow paging carriers to compete against cellular and broadband PCS carriers that offer messaging services, within geographically defined service areas that are similar to paging service areas and are overlapping in scope. PageNet is

Although PageNet is licensed for paging facilities below 900 MHz, the majority of PageNet services are provided on paging channels in the 931 MHz and 929 MHz bands. As a result of this fact, PageNet's focus in these Interim Comments relates specifically to the 900 MHz paging channels.

See e.g., Private Carrier Paging Systems at 929-930 MHz (Channel Exclusivity), 8 FCC Rcd 8318 (1993).

particularly concerned that existing paging systems be permitted to be modified or modestly expanded in order to serve the natural growth in a market during the next months and year or so that PageNet anticipates the freeze will last. For example, in PageNet's experience, many of the new hospitals being built today are being built on the periphery of established communities. These hospitals will need highly reliable coverage throughout, and paging carriers will need to provide that service. Similarly, as communities expand and increase building density, coverage requirements have to be re-examined and systems modified.

Coverage requirement concerns will be particularly acute in the context of paging services. Users of paging services have the expectation that messages sent will be received within their community of interest. With current paging technology, this requires that systems have to be continuously designed and modified in order to maintain this exceptionally high degree of reliability. For example, if there is increased building density in an area, a new transmitter may need to be put in, or an existing transmitter site moved or modified in terms of its height or power. This is because, unlike cellular, SMR, and PCS, if a call does not reach a paging subscriber, neither the calling party nor the network has any way of knowing the transmission was not received and needs to be re-sent.

Accordingly, there are compelling service-based public interest reasons why areas that are contiguous to existing service areas must be served during the freeze and beyond. Further, because of the existence of incumbent licensees and the proximity of the incumbent's system, areas directly adjacent to an existing system's service area will not provide the market-area licensee a meaningful opportunity to provide paging service. Therefore, the existing licensee on that channel should be given the opportunity to provide service. If these adjacent areas cannot be served prior to the adoption of geographic service areas, these adjacent areas may never be served because the incumbent licensee will be completely frozen in its existing contours and the market-area licensee will not be able to serve the area because of the existence of the incumbent co-channel license.

A. Exception 1 -- Modest Expansion of Existing Paging Systems Should Be Allowed On A Limited, But Permanent, Basis

Paging carriers, especially in the 900 MHz band, should be allowed to file applications for permanent authorization for new same channel facilities within 40 miles of a facility that was authorized as of the date of the freeze and is part of an operating system. The placement of additional same channel transmitters within 40 miles of an existing transmitter would allow the carrier to serve an area that is directly adjacent to

The 40 miles is consistent with the Commission's definition of "same service area." See 47 C.F.R. § 22.539.

its existing service area and within the interference contour of the existing facility.' In fact, because of the co-channel separation requirements of Sections 22.537 and 90.495 of the Commission's Rules, which, for both services, is a minimum of 70 miles, the area that will be served by this very limited extension of an operating system is not even available to be served by other co-channel carriers.

The exception described above is beneficial because it will allow paging carriers to continue to meet subscriber demand for broader coverage and greater depth necessary to serve communities, most of which are growing, not static. To illustrate this point, attached at Exhibit 1 to these Interim Comments are depictions of PageNet systems in Michigan and the Eastern Region of the United States between Philadelphia and New York that have been stranded as a result of the freeze. In these areas, PageNet was in the process of building local wide-area paging systems. As the maps reflect, PageNet has numerous previously authorized operating facilities in both areas and has proposed many additional facilities to broaden the geographic scope of service and to increase the depth of service for the benefit of current and new subscribers. All of the applications reflected on the maps were filed with the Commission weeks and

For both 931 and 929 paging systems, the minimum service area contour has a radius of 20 miles and the minimum interference contour has a radius of 50 miles. See 47 C.F.R. § 22.537.

See 47 C.F.R. §§ 22.537 and 90.495.

even months prior to the freeze. However, because the applications were not placed on public notice by December 6, 1995, they are ineligible for processing and, without the exceptions to freeze proposed herein, the construction of these systems will have to wait until after the paging spectrum auction, thus delaying service to subscribers.

The maps reflect the 40-mile composite contour of authorized facilities. The maps also reflect that there are many sites that are necessary to improve service to subscribers that are within the 40-mile composite contour. The area that would be served by the sites proposed within the 40-mile composite contour will not serve new areas nor will they serve areas that other co-channel licensees could serve. Therefore, the 40-mile exception to the freeze will allow bona fide operators to fill-out their coverage area and increase their depth of service on a very limited basis. These limited modifications can be achieved without significant intrusion into the unserved area of a market because:

- The placement of additional transmitters within 40 miles of an existing transmitters equates to the placement of a same channel within 20 miles of the edge of an existing service area and this area cannot be served by another licensee;
- The additional licensing could only be proposed within 40 miles of a same channel facility that was authorized as of the date of the freeze allowing for no significant intrusion into unserved areas; and

See NPRM at ¶ 145.

• The additional transmitter sites are limited to placement within 40 miles of a transmitter that was authorized as of the date of the freeze means that carriers will not be able to propose facilities that seek to serve area outside of the existing interference contour of the system and will prevent expansion of transmitter sites in a daisy-chain fashion into unserved areas.

This exception to the freeze is in the public interest because it: (1) provides paging carriers with the ability to license on a permanent basis additional transmitting sites that are in close proximity (within the interference contour of the existing facilities) to sites that were authorized to operating systems as of the date of the freeze; and (2) allows paging carriers to maintain and enhance existing service to subscribers without significantly effecting the availability of unserved area.

With respect to 929 MHz systems, PageNet suggests that the 40-mile exception be applicable to these systems under the same criteria described above. However, PageNet does not advocate suspending the specific requirements of exclusive PCP systems under Sections 90.494 and 90.495 of the Commission's Rules. 10 If the 40-mile exception is made available to PCP licensees, the PCP licensee should only be able to propose sites within 40 miles of an existing facility if the sites also comply with the requirements of Sections 90.494 and 90.495(a) of the Commission's Rules. Furthermore, under no circumstances should the PCP licensee be able to propose additional transmitter sites that violate the co-channel separation standards for local, regional

¹⁰ 47 C.F.R. §§ 90.494 and 90.495.

and nationwide systems codified at Section 90.495(b)(1)-(3) of the Commission's Rules.

One final issue regarding 40-mile exception applications is competing applications. In this instance, competing applications should only be allowed if the second application proposes facilities that are within 40 miles of a same channel system licensed to the applicant, and the competing applicant's system was authorized and had existing operations as of the date of the freeze. Because of the separation requirements of Sections 22.537 and 90.495 of the Commission's Rules, and the proposed 40 mile requirement, it is unlikely that competing applications could be filed against applications seeking modification under the proposed 40-mile exception. However, in order to provide for competing applications, the Commission should allow for a 30-day filing period for competing applications after public notice of an initial application." If competing applications are filed, settlements based upon technical solutions should be allowed. To the extent that the 40-mile exception would be applicable to paging channels below 900 MHz, the Commission could apply this exception to all paging channels licensed on an exclusive basis.

B. Exception 2 -- Secondary Site Licensing Should Be Allowed

In the NPRM, the Commission proposed that incumbents be able to file new applications that would expand or modify existing

This would mean that the public notice of PCP applications seeking to modify all non-nationwide systems under this exception.

systems beyond the system's interference contours on a secondary basis. PageNet strongly supports this secondary licensing proposal and believes that, even if no other exceptions to the freeze are adopted, some form of a secondary licensing exception to the freeze must be adopted.

As indicated in the NPRM, secondary licensing should only be available to incumbent carriers that were operating systems as of the date of the freeze. PageNet suggests that the ability to license secondary sites should be predicated upon the existence of an operating same channel facility within a specific geographic or market-area in which the secondary facility is proposed. PageNet believes that this geographic or market-area should be based on the geographic areas over which a the majority of wide-area paging system operate today.

Returning to the illustration attached hereto at Exhibit 1, as the maps reflect, the build-out of both of these systems would naturally extend beyond the 40-mile composite contour of the existing sites. The sites reflected outside the 40-mile composite contour of the authorized systems on the maps were proposed prior to the freeze and are vital to a high-quality wide-area service offering to subscribers. To maintain and

NPRM at \P 143.

¹³ Id.

Because some metropolitan areas straddle more than one state, the geographic areas used for this interim secondary license should be the geographic markets proposed at paragraph 34 of the NPRM.

enhance service and to meet subscriber demand, PageNet is willing and should be allowed to license these additional sites on a secondary basis. Such secondary licensing will allow carriers, such as PageNet, to meet subscriber demand and thereby serving the public interest while preserving currently unserved areas for auction.

In the NPRM, the Commission requested comment on how to address situations in which two licensees filed applications for secondary sites that conflict with each other. Like the 40-mile exception, the Commission should restrict secondary licensing to only those carriers that had an operating presence in the geographic or market-area as of the date of the freeze on the specific channel sought for secondary licensing. Applications for secondary licensing should be placed on public notice and competing applications should be accepted within 30 days. In those situations where there are conflicting applications, meaning the applicants do not comply with the separations standards of Sections 22.537 and 90.495 of the Commission's Rules, the applicants should be allowed to resolve conflicts through engineering solutions.

III. The Ability To Construct And Operate Fill-In Transmitters And Make Other Minor Modifications Is Vitally Important To Service Availability For Subscribers

The ability to construct and operate fill-in transmitters has been essential for 931 MHz paging carriers in maintaining and enhancing service to subscribers. Fill-in transmitters for 931 MHz systems allow paging carriers to:

 Provide needed coverage to new customers (e.g., hospitals within an existing service area);

- Meet in-building coverage requirements in existing and new service areas;
- Employ faster baud rate service products;
- Achieve greater use of alpha-numeric data technologies and services; and
- Reconfigure existing paging systems to increase depth of coverage.

In the NPRM, the Commission extended the ability to construct 100% fill-in transmitters to 929 MHz licensees. However, unlike 931 MHz licensees who are able to construct and operate fill-in transmitters pursuant to Sections 22.163, 22.165(d) and 22.537(e) of the Commission's Rules, the 929 MHz carriers must utilize the formula proposed at paragraph 52 of the NPRM to calculate the interference contours of their systems. 15

PageNet opposes the use of both the service and interference formulas proposed at paragraph 52 of the NPRM because the use of the formulas will result in inconsistent and unreliable cochannel separation. When building-out PageNet's nationwide PCP systems, PageNet found that it was imperative to know exactly the protection it must provide to grandfathered or prior filed exclusive paging systems. This determination was simple and uniform because the co-channel separation was based upon set distances between co-channel transmitters. Likewise, at 931 MHz, separation standards may be calculated easily and consistently based upon Tables E-1 and E-2 of Section 22.537(e) of the Commission's Rules. It is the necessity of simplicity in the

¹⁵ NPRM at ¶¶ 140 and 141.

¹⁶ NPRM at ¶ 140, n. 271.

calculation of co-channel separation that 900 MHz licensees currently enjoy in the construction of systems that PageNet believes will ultimately convince the Commission not to adopt the formulas proposed in the NPRM.

It should be emphasized that the formula proposed for the interference contour in the NPRM is so restrictive that it would not allow 931 MHz paging carriers to construct and operate fillin transmitters as currently provided for under Sections 22.163 and 22.165(d) of the Commission's Rules. Therefore, the formula cannot be adopted for 931 MHz without significant disruption to existing paging service. The formulas themselves are a radical departure from the Commission's established parameters under which both 931 MHz and 929 MHz paging systems were built. Because 900 MHz paging systems have not been built-out pursuant to the proposed formula, the use of the formulas undermine the investment backed expectation of 900 MHz carriers and will cause paging carriers economic harm. It should be emphasized that the economy of paging systems and the price charged for paging services are directly related to the regulatory structure under which these systems have been constructed. PageNet hopes that the Commission will understand and acknowledge these facts by not using the interference contour formula specified at paragraph 52 of the NPRM.

Although PageNet opposes the use of the formulas proposed in the NPRM, PageNet does not oppose the ability of 929 MHz carriers to make modifications and construct and operate fill-in transmitters in a manner similar to 931 MHz. To that end, because the Commission's Rules do not establish interfering contours for 929 MHz systems, PageNet suggests adopting the minimum interference contour provided for under Section 22.537(e) of the Commission's Rules, which is a circle with a 50-mile radius from the location of a given transmitter.¹⁷

Finally, as a result of the phrasing of the language of the NPRM, it is remotely plausible to reach the conclusion that the Commission intended 931 MHz paging carriers to utilize the interference contour proposed in the NPRM. If the Commission did intend to subject 931 MHz paging carriers to the proposed interference contour formula for the proposes of minor modifications and the construction and operation of fill-in transmitters, PageNet would be opposed to the use of the proposed interference contour formula at 931 MHz for the reasons stated above. PageNet respectfully submits that both the service and interference contour formulas proposed in the NPRM regarding 900 MHz paging facilities should not be used prior to the Commission's complete and considered evaluation of the impact of the formulas on paging carriers and their ability to provide service to subscribers.

¹⁷ See 47 C.F.R. § 22.537(e), Table E-2.

¹⁸ NPRM at ¶¶ 140-141, fn. 271.

IV. Other Matters

A. Nationwide Exclusive PCP Systems

The NPRM stated that the continued development of nationwide systems that have been fostered by nationwide assignment of certain channels will benefit the public interest and should be allowed to continue development without disruption. 19 However, as of the date of the filing of these Initial Comments, PCIA has not begun coordinating additional sites for the constructed nationwide exclusive PCP systems. The Commission should clarify that the expansion of nationwide systems is to continue and that PCIA should coordinate applications for additional and modified facilities for the nationwide exclusive systems the were constructed as of February 8, 1996.20 In addition, in light of the fact that the proposed geographic licensing will mean that nationwide exclusive PCP licensees will be able to build and modify systems without filing applications for individual sites, the Commission should allow nationwide exclusive PCP licensees to continue with the build-out of their systems without the coordination and the filing of applications for each additional transmitting site.

B. Licensing Above Line A And Along The United States And Mexican Border

Above line A and along the United States and Mexican border, certain 931 MHz and 929 MHz channels are allocated to Canada and

¹⁹ NPRM at ¶ 26

²⁰ NPRM at ¶ 26.

Mexico on a primary basis. In these border areas, these channels are not available for licensing by U.S. carriers unless they have reached an agreement with the Canadian or Mexican co-channel licensee. As the freeze aspect of the NPRM is written, it is not clear if U.S. licensees who have entered into agreements regarding licensing in the border areas may go forward and license facilities in the border areas. The Commission should allow consent border area licensing to continue during the freeze because such licensing will have no impact on available unserved areas for auction and such licensing promotes international cross-border roaming. In the past, the Commission has allowed agreements with Mexican and Canadian licensees that allow a U.S. licensee to construct facilities on the U.S. side of the border area on the foreign licensee's channel. The U.S. and foreign carriers essentially enter into an intercarrier arrangement that allows their subscribers to cross the border and receive service. This international cooperation is vital to the development of communication service offerings and will serve the public interest because it will allow a subscriber to travel from Mexico, to the United States, and into Canada while receiving messages from a single paging unit. Accordingly, the Commission should clarify that the freeze does not impact the filing of applications for channels in the border areas that have been allocated to either Mexico or Canada if the proper consents have been obtained by the applicant from the appropriate Mexican or Canadian licensee.

V. Conclusion

There is a significant tension between the freeze and the completion of the auction process resulting in the licensing of channels on a geographical market-area basis. The longer the duration of time between these two events, the greater the tension becomes. As demonstrated at Exhibit 1 hereto, the freeze strands paging systems that should be completed in order to offer to subscribers the highest quality of service possible. public interest resolution of this tension is the ability to continue the build-out of existing paging systems under the 40mile and secondary licensing exceptions to the freeze. PageNet respectfully submits that these exceptions serve the public interest by providing service to subscribers in areas that would otherwise go unserved during this period, and possibly beyond, if the existing channel licensee does not become the geographic licensee, while having only a minimum impact on available unserved areas.

The Commission's primary goal in this proceeding is to preserve the public's ability to receive paging service wherever there is a demand. Because paging is vital to millions of Americans and the growth in paging is projected to continue exponentially, it is in the public interest that the Commission adopt interim measures that will allow paging carriers to expand operations of systems that were in operation as of the date of the freeze. The reason the Commission should allow very limited exceptions to the freeze, 40-mile primary licensing and secondary licensing, is that paging subscribers invariably require a wider

service area and the addition of new customers invariably requires that systems are reconfigured for greater depth of service. Since paging carriers are presently licensed on a transmitter-by-transmitter basis, there are situations, such as PageNet's stranded systems in Michigan and Philadelphia, where the carrier has not completed its build-out of a system, but needs to finish some measure of the build-out in order to meet subscriber demand. To allow for the completion of these systems, which will serve to maintain and enhance service to subscribers, the Commission must allow the additional primary licensing and, in addition to, but at the very least, secondary licensing of transmitter sites as proposed herein.

WHEREFORE, for the foregoing reasons, PageNet respectfully requests that the Commission adopt interim licensing procedures during the pendency of the freeze in accordance with the comments herein.

Respectfully submitted,

PAGING NETWORK, INC.

Bv:

Judith St. Ledge/r-Roty

Paul G. Madison

REED SMITH SHAW & McCLAY

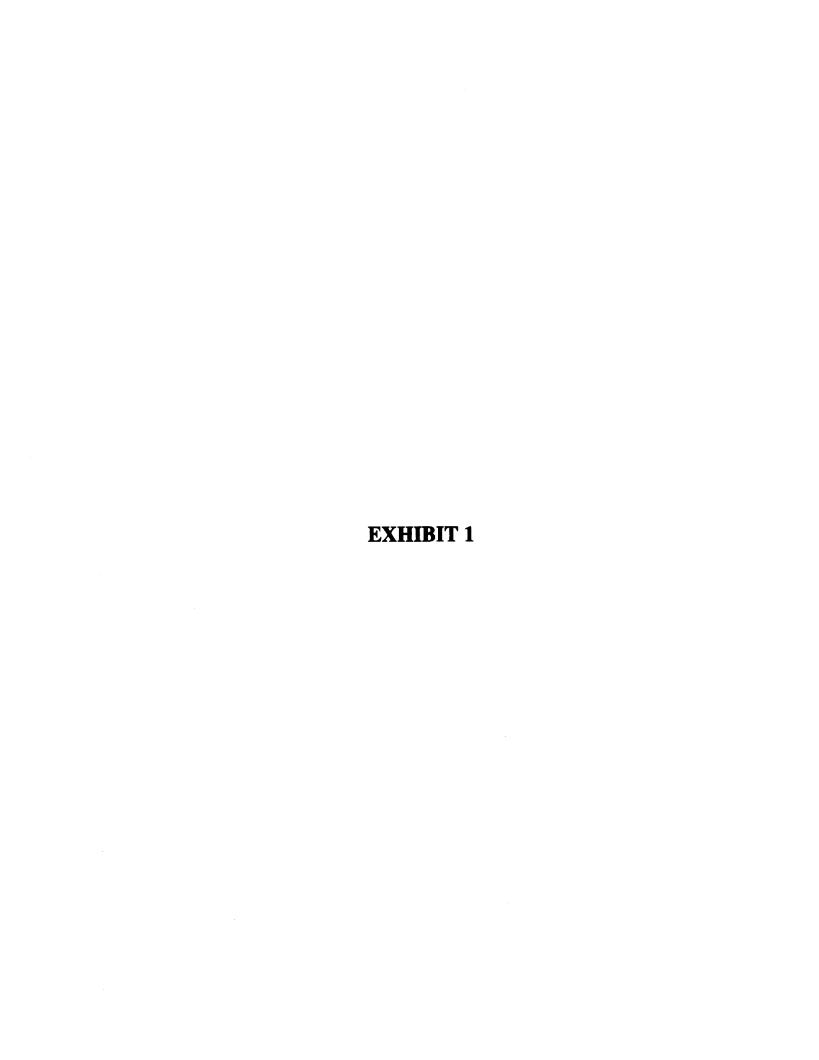
1301 K Street, N.W.

Suite 1100 - East Tower Washington, DC 20005

202-414-9281

Its Attorneys

March 1, 1996



Michigan 931.2625 MHz - PageNet Filings PageNet - Michigan 931.2625 MHz Filings ■ - PageNet Filings Public Notice Accepted ⋆ - PageNet Authorized Facilities w/ 40 mile Contours

Michigan 931.2625 MHz - PageNet Filings Public Notice Accepted

C FILE NO	FCC_LIC_NO	FREQUENCY	PNA	ADRESS1	CITY	ST	LAT	LONG	EXT	ENTION
'88-CD-P/ML-96		931.2625	01/31/1996	80650 Earle Memorial Hwy	Almont	+		083-02-10		Y
		931.2625		25 WEST MICHIGAN AVE	BATTLE CREEK	MI	042-19-11	085-1 1-01		
)50-CD-P/ML-96		931.2625	01/24/1996	Krause Road	Bear Creek			084-52-58		N
)75-CD-P/ML-96		931.2625	01/24/1996	109 School Road	Brighton			083-46-34		Y
143-CD-P/ML-96		931.2625	01/24/1996	425 HENICKSVILLE	COLDWATER	MI	042-03-28	084-59-51		Ÿ
68-CD-P/ML-96		931.2625	01/31/1996	8127 South US 131	Cadillac			085-24-09		Ň
577-CD-P/ML-96		931.2625	01/31/1996	US Rte 23 6.7 mi E of	Cheboygan			084-20-37	-	N
)86-CD-P/ML-96		931.2625		18500 Route M-52	Chelsea			084-04-10		Ÿ
113-CD-P/ML-96		931.2625		17480 N. Territorial	Chelsea			08-4-O 1-51		Ÿ
366-CD-P/ML-96		931.2625	01/31/1996	9180 Rattalee Lake Road	Clarkston	MI	042-46-28	083-28-14		Ÿ
120-CD-P/ML-96		931.2625	01/24/1996	14696 "V" Avenue East	Climax	М	042-07-43	085-20-16		Ÿ
129-CD-P/ML-96		931.2625	01/24/1996	Int of 92nd St & Division	Corinth			085-38-58		Ÿ
371-CD-P/ML-96		931.2625	01/31/1996	32nd Ave E of State Route 140	Covert	Mi	042-18-02	08-6-1 5-03		Ÿ
127-CD-P/ML-96		931.2625	01/24/1996	R-3991 92nd Avenue	Decatur			085-5-503		Ÿ
071-CD-P/ML-96		931.2625	01/24/1996	1249 Washington Blvd.	Detroit	MI		083-03-05		Ÿ
088-CD-P/ML-96		931.2625		8606 North Dewitt Rd	Dewitt	Mi		084-3-4-27		Ÿ
979-CD-P/ML-96		931.2625	01/31/1996	INT OF FALCON & GRASMERE RDS	ELKTON			083-07-26		N
077-CD-P/ML-96		931.2625	01/24/1996	Near Holmes Hwy; 2 mi South of	Eaton Rapids			084-3906		Ÿ
096-CD-P/ML-96		931.2625	01/24/1996	Cushing Road	Eau Claire			086-14-05		Ÿ
888-CD-P/ML-96		931.2625		2 mi W of Escanaba	Escanaba			087-07-16		N
		931.2625		7000 KILGORE	GREENWOOD TOWNSHIP			082-4-2-24		Ÿ
652-CD-P/ML-96		931.2625	01/31/1996	Hwy 32 .75 mi E of City Cente	Gaylord	MI	045-02-44	084-39-58		N
176-CD-P/ML-96		931.2625	01/24/1996	333 Bridge Street	Grand Rapids			085 -041		Ÿ
657-CD-P/ML-96		931.2625	01/31/1996	2.8 mi S of Grayling	Grayling	MI	044-36-50	084 1-05		N
1 HOLD		931.2625		150 W Temple	Greenwood Twsp	MI	044-01-45	084-51-03		N
244-CD-P/ML-96		931.2625	01/24/1996	1275 Ball Road	Hillsdale	MI	041-57-46	084-3-8-12		Y
131-CD-P/ML-96		931.2625	01/24/1996	540 E. 24th Street	Holland	MI	042-46-32	DES6		Y
471-CD-P/ML-96		931.2625		3090 Highland Drive	Hudsonville	MI	042-51-02	085-51-31		Y
584-CD-P/ML-96		931.2625	01/31/1996	6050 Flemings Road	Independence Twsp	MI	042-44-32	083-2331		Y
238-CD-P/ML-96		931.2625		I-75 & M-27	Indian River	MI	045-27-40	084-36-47		N
887-CD-P/ML-96		931.2625	01/31/1996		Ironwood			090 - 0 8-51		N.
989-CD-P/ML-96		931.2625	01/31/1996		LACHINE			083-4-2 -56		N
869-CD-P/ML-96		931.2625		11545 Bishop Road	Lansing			084 3640		Y
:064-CD-P/ML-96		931.2625		Int I-96 & I-27 (3200 Pinetree	Lansing			084-36-00		Y
102-CD-P/ML-96		931.2625	01/24/1996	124 W. Allegan	Lansing			084-33-13		Y
:049-CD-P/ML-96		931.2625		.4 mi N of Lapeer City Limits	Lapeer	MI	043-04-15	083-18 8-53		Y
:662-CD-P/ML-96		931.2625		Int of Noble & Haven Rds	Leonard	MI	042-51-24	083-09 -27		Y
:061-CD-P/ML-96		931.2625	01/24/1996	Int of Lincoln & 3 Mile Rd	Lowell			085-20-58		Y
		931.2625		2080 E. GORDONVILLE RD	MIDLAND			084-1 7-14		Y
!574-CD-P/ML-96		931.2625		1 mi WSW of I-75 & Jamet St.	Mackinaw City			084 4 5-04		N
1236-CD-P/ML-96		931.2625		1705 Vine Street	Manistee			OE36-18 8-21		N
1076-CD-P/ML-96		931.2625	01/24/1996		Marengo			084 -1 4-51		Y
!882-CD-P/ML-96		931.2625		1 mile SW of Negaunee	Marquette			087-37-37		N
2085-CD-P/ML-96		931.2625		11383 North Morrish Road	Montrose			083-50-04		Υ
2054-CD-P/ML-96		931.2625		1160 Remus Road	Mt. Pleasant			084 - 4 9-26		N
202-CD-P/ML-96		931.2625		356 East Beard Road	Munger			083-45-51		Υ
2567-CD-P/ML-96		931.2625		St. Martin Hill	Munising Twsp			086-4-0-10		N
2106-CD-P/ML-96	ļ <u>.</u>	931.2625	01/24/1996	3705 W. Giles Rd	Muskegon	MI	043-16-38	086-20-05		Υ